

# Exhibit 6

1                   - EVREN ERYUREK -  
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3                   IN THE UNITED STATES DISTRICT COURT  
4                   FOR THE SOUTHERN DISTRICT OF NEW YORK

5                   ----- X  
6                   ULKU ROWE,

7                   Plaintiff,

8                   Case No.  
9                   19 Civ. 08655(LGS)(GWG)

10                  v.

11                  GOOGLE LLC

12                  Defendant.

13  
14                  ----- X  
15                  DATE: December 3, 2020  
16                  TIME: 11:37 a.m.

17  
18                  VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
19  
20                  OF EVREN ERYUREK, held via Zoom, pursuant to  
21                  Notice, before Hope Menaker, a Shorthand Reporter  
22                  and Notary Public of the State of New York.  
23  
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1                           - EVREN ERYUREK -

2 A P P E A R A N C E S

3

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5 Attorneys for Plaintiff

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22

ALSO PRESENT: (Via Zoom)

23

PETER COOPER, ESQ.

24

JOSE RIVERA - Videographer

25

1                   - EVREN ERYUREK -

2                   IT IS HEREBY STIPULATED AND AGREED by  
3 and among the attorneys for the respective parties  
4 hereto, that the sealing and filing of the within  
5 deposition be waived.

6

7                   IT IS FURTHER STIPULATED AND AGREED  
8 that all objections, except as to the form, are  
9 reserved to the time of trial.

10

11                  IT IS FURTHER STIPULATED AND AGREED  
12 that the within examination and any corrections  
13 thereto may be signed before any Notary Public  
14 with the same force and effect as if signed and  
15 sworn to before this Court.

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1                   - ROUGH DRAFT - EVREN ERYUREK

2 roles?

3                   MR. GAGE: Objection.

4 A. Global client leads versus global  
5 client technical leads was definitely an ambiguity  
6 at best.

7 Q. And what about with respect to  
8 technical solutions?

9                   MR. GAGE: Objection.

10 A. So that was something I was familiar  
11 with it because we were trying to figure out how  
12 -- kind of this last mile, if you will, working  
13 with the customers and so forth. Again there was,  
14 you know, enough of an overlap between those  
15 three.

16 Q. Okay. You can put that document  
17 aside.

18                   How long did you actually function  
19 under Mr. Shaukat or in his organization?

20                   MR. GAGE: Objection.

21 A. Don't know exactly, but weeks.

22 Q. I want you to look now at Exhibit --  
23 or Tab 122 --

24 A. Yup.

25 Q. -- which I think has been marked as

1 - ROUGH DRAFT - EVREN ERYUREK

2 Q. Was your technology-based experience

3 relevant to the PM role?

4 MR. GAGE: Objection.

5 A. Yes.

6 Q. Was your experience at designing,

7 scoping, and delivering complex applications and

8 services relevant?

9 MR. GAGE: Objection.

10 A. Yes, but I have PMs who are much more

11 hands-on than I am.

12 Q. Do you mean you have PMs reporting to

13 you?

14 A. Yes.

15 Q. So at your level, it's less of a

16 hands-on role; is that right?

17 A. Correct.

18 Q. Is experience with multiple software

19 design methodologies relevant to the PM role?

20 MR. GAGE: Objection.

21 A. That would be more -- on the how part

22 of it that would be more engineering, but I like

23 it because I was a champion in like how to

24 develop/drive agile software and so forth -- agile

25 software development.

1 - ROUGH DRAFT - EVREN ERYUREK

2 Q. Was an understanding of the  
3 challenges modern enterprises face with respect to  
4 scale, speed, and user expectations relevant to  
5 the -- the PM role?

6 MR. GAGE: Objection.

7 A. Yes.

8 Q. Does the PM role require that you get  
9 hands-on with customer projects?

10 MR. GAGE: Objection.

11 A. You're with customers all the time.

12 Q. Did the PM role involve designing and  
13 solving AI problems?

14 MR. GAGE: Objection.

15 A. I'm not in the AI team.

16 Q. Does it involve defining and solving  
17 technology problems?

18 MR. GAGE: Objection.

19 A. For customers issues.

20 Q. Does the PM role involve private  
21 whiteboarding sessions?

22 MR. GAGE: Objection.

23 A. You mean with customers?

24 Q. Yes.

25 A. Yes.

1 - ROUGH DRAFT - EVREN ERYUREK

2 Q. Does it involve any aspect of public  
3 evangelism?

4 MR. GAGE: Objection.

5 A. Yes. I give keynotes. I talk. I  
6 write blogs.

7 Q. Does the PM role involve doing deep  
8 dives with internal engineering teams?

9 MR. GAGE: Objection.

10 A. Yes.

11 Q. Does the PM role involve meeting  
12 across Google technical teams during an  
13 engagement?

14 MR. GAGE: Objection.

15 A. Yes.

16 Q. Does the PM role identify -- involve  
17 identifying design and development or deployment  
18 friction points from a customer's perspective?

19 Does the PM role involve identifying  
20 design, development, or deployment friction points  
21 from the customer's perspective?

22 MR. GAGE: Objection.

23 A. Yes.

24 Q. Does the PM role involve working with  
25 customers or partners to define joining

1 - ROUGH DRAFT - EVREN ERYUREK

2 initiatives?

3 MR. GAGE: Objection.

4 A. Yes.

5 Q. Does the PM role involve

6 corroborating across functional and product area

7 boundaries?

8 MR. GAGE: Objection.

9 A. Yes.

10 Q. Does the PM role involve working with

11 broader Google engineering and research teams?

12 MR. GAGE: Objection.

13 A. Yes.

14 Q. In what ways is the PM role similar

15 to the role that you were performing in OCTO?

16 A. Customer sponsorship evangelization,

17 working with other teams and so forth, but nothing

18 to do with the -- how we build a product, how we

19 define a strategy, how we execute that strategy.

20 Q. And so the next question is: How is

21 the PM role different from the role you were

22 performing in OCTO?

23 A. We are responsible for defining

24 long-term roadmaps, executing them incrementally

25 on quarterly, whatever short term, and the

1 - ROUGH DRAFT - EVREN ERYUREK

2 understanding where the trends are, market trends  
3 are, and bringing it back to what our products and  
4 platforms need to be doing.

5 And another responsibility, we have  
6 to make sure that our revenue mark targets and so  
7 forth are projected accordingly and we deliver on  
8 our expected numbers.

9 Q. With respect to your role in PM, do  
10 you understand that you're evaluated against a  
11 leveling guideline?

12 A. Yes.

13 Q. And those engineering leveling  
14 guidelines that we looked at before, are those  
15 also relevant to the PM role?

16 A. Yes.

17 MS. GREENE: Okay, I'm just about  
18 done. What I want to do is take a short  
19 break and then we'll come back and finish up.

20 THE WITNESS: So what -- how long do  
21 we need?

22 MS. GREENE: Let's take ten minutes.

23 MR. GAGE: Okay, we'll come back ten  
24 minutes after the hour.

25 THE WITNESS: All right.

1  
2 C E R T I F I C A T E3 STATE OF NEW YORK )  
4 ) ss.5 COUNTY OF NEW YORK )  
67 I, HOPE LYNN MENAKER, a Notary Public within  
8 and for the State of New York, do hereby certify:9 That EVREN ERYUREK, the witness whose  
10 deposition is hereinbefore set forth, was duly  
11 sworn by me and that such deposition is a true  
12 record of the testimony given by the witness.13 I further certify that I am not related to  
14 any of the parties to this action by blood or  
15 marriage, and that I am in no way interested in  
16 the outcome of this matter.17 IN WITNESS WHEREOF, I have hereunto  
18 set my hand this 15th day of December, 2020.19  
20 

21 HOPE LYNN MENAKER

22

23

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1  
2 INDEX  
34 WITNESS: EVREN ERYUREK  
56 EXAMINATION BY  
7PAGE  
8 MS. GREENE 5  
910 EXHIBITS FOR IDENTIFICATION  
11

NUMBER	DESCRIPTION	PAGE
Exhibit 129	GOOG-ROWE-00017876-881	11
Exhibit 130	GOOG-ROWE-00054168-5470	55
Exhibit 131	GOOG-ROWE-00053864.R-68.R	97
Exhibit 132	GOOG-ROWE-00053776.R-77.R	98
Exhibit 133	GOOG-ROWE-00053879-53881	101
Exhibit 134	GOOG-ROWE-00053779.R	103
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